

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

MARTÍN VÉLEZ RÍOS; JUAN RIVERA PAGÁN;  
LUZ M. RODRÍGUEZ SÁNCHEZ; CARLOS M.  
PLAZA GONZÁLEZ; JOSÉ JIMENEZ YORDÁN;  
RAFAEL SHULZE; JORGE CABALLERO  
JIMENEZ; CECILIO REYES GARCED; EROINA  
SANTIAGO; LUIS ANTONIO COLÓN; MISAEL  
BATISTA HERNÁNDEZ; JOSÉ JUAN MEDINA  
OLIVERA; ALMA M. ALVELO; GABRIEL  
OCACIO ACEVEDO; NEIVIDA TORRES  
MELÉNDEZ; MIGUEL ESTRADA GONZÁLEZ;  
EFRAÍN ORTIZ POMALES; RAMÓN BERRIOS  
RIVERA, for himself and in representation of THE  
ESTATE OF RAMÓN BERRÍOS; RAMÓN  
GALARZA ECHEVARÍA for himself and in  
representation of THE ESTATE OF RAMÓN  
ANTONIO GALARZA GONZÁLEZ; and,  
GABRIEL RODRÍGUEZ for himself and in  
representation of THE ESTATE OF ANA LYDIA  
ACEVEDO DEL RÍO,

Plaintiffs,

v.

MONSANTO COMPANY, “JOHN DOE 1” to  
“JOHN DOE 50”; and, “JOHN DOE 51” to “JOHN  
DOE 100”

Defendants.

CIVIL NO.: 3:20-cv-01198-JAG

RE:

PRODUCT LIABILITY, TORT,  
NEGLIGENCE

**JOINT MOTION FOR EXTENSION OF TIME TO FILE JOINT INITIAL  
SCHEDULING MEMORANDUM**

TO THE HONORABLE COURT:

COME NOW Plaintiffs and Defendant, Monsanto Company (“Defendant”), collectively  
(the “Parties”), without waiving any rights or defenses, through their undersigned attorneys and  
very respectfully STATE and PRAY as follows:

1. On October 14, 2020, the Court issued an order, among other things, instructing the Parties to file the Joint Initial Scheduling Memorandum by October 30, 2020. **ECF No. 16.**

2. The Parties' legal representatives have initiated conversations regarding their stance on case management, discovery, motion practice and how the trial should be structured in this action given the nature of the allegations, claims and the corresponding complexities.

3. The Parties agreed to exchange proposals on such case structuring and try to resolve any differences without the Court's intervention or at least limit the issues that need to be raised for judicial resolution.

4. Accordingly, the Parties respectfully request additional time to complete this process and file the document ordered by the Court. The Parties move the Court for a 14-day extension of the deadline to file the Joint Initial Scheduling Memorandum; that is, up to November 13, 2020.

5. This extension is requested pursuant to LOCAL CIVIL RULE 6 and 16 (j)(1).

6. The Parties reserve all rights, including, but not limited to their respective positions on how case management should be structured in this action.

**WHEREFORE**, the Parties respectfully request the Court grants an extension of 14 days, until November 13, 2020, to file the Joint Initial Scheduling Memorandum.

**WE HEREBY CERTIFY** that on this same date we electronically filed this motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of October of 2020.

s/ Jorge Carazo-Quetglas

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